Daniel J. Kornstein (DK - 3264) KORNSTEIN VEISZ WEXLER & POLLARD, LLP 757 Third Avenue New York, New York 10017 (212) 418-8600

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MITSUBISHI INTERNATIONAL

CORPORATION,

08 CV 03180(DC)(DF)

Plaintiff,

:

NOTICE OF MOTION

-against-

ECF Case

CHLORINE PARTNERS, LP,

:

Defendant.

Derendant.

PLEASE TAKE NOTICE that upon the Affidavit of Nobuhiko
Yamada sworn to on July 16, 2008 and the exhibits annexed
thereto, and plaintiff's Local Rule 56.1(a) Statement, plaintiff
will move this Court before the HONORABLE DENNY CHIN, United
States District Judge, at the United States Courthouse at 500
Pearl Street, New York, New York 10007, Courtroom 11A, on a date
to be set by the Court, for an order pursuant to Fed R. Civ. P.
56 granting summary judgment to plaintiff, together with such
other and further relief as to the Court may seem just and
proper.

PLEASE TAKE FURTHER NOTICE that pursuant to this Court's Order at the conference on June 27, 2008, answering papers, if any, shall be served on or before August 8, 2008, and reply papers, if any, shall be served on or before August 18, 2008.

Dated: New York, New York July 17, 2008

KORNSTEIN VEISZ WEXLER & POLLARD, LLP

By: Daniel J. Kornstein (DK - 3264)

757 Third Avenue New York, New York 10017 (212) 418-8600

Attorneys for Plaintiff

TO: Joseph E. Macy
BERKMAN, HENOCH, PETERSON & PEDDY, P.C.
100 Garden City Plaza
Garden City, New York 11530
(516) 222-6200
Attorneys for Defendant